

Georgia Department of Natural Resources

Environmental Protection Division

Underground Storage Tank Management Program

4244 International Parkway, Suite 104, Atlanta, Georgia 30354

Lonice Barrett, Commissioner

David M. Word, Assistant Director

(404) 362-2687

November 3, 2003

Mr. Brent Thomas
GISCO Industries
221 Magnolia Ave.
St. Simons, GA 31522

SUBJECT: **UST Closure Report Review Comments:**
East Coast Ice Company
1029 Bay Street
Brunswick, Glynn County, GA
Facility ID: 0630017*1

Dear Mr. Thomas:

The Georgia Underground Storage Tank Management Program (USTMP) has received your consultant's letter, dated October 23, 2003, that forwarded a UST Closure Report. The report was prepared by Korb Engineering Company.

We have conducted a technical review of the UST Closure Report. The basis for this review is the Georgia Rules for Underground Storage Tank Management (GUST Rules, revised 1998). Our comments are outlined in the enclosure. Please amend the UST Closure Report to address these by **January 3, 2004**.

Unless one of the outlined EPD Comments requests otherwise, you are required to submit only your responses to these comments. Resubmittal of a complete UST Closure Report is not necessary.

If you have any questions, please contact me at (404) 362-2597.

Sincerely,



Kelly B. Adams
Geologist
Corrective Action Unit II

KBA/

S:/land/landdocs/kellya/pending03/0630017.15


Enclosure

cc with EPD comments: Andrew D. Korb, Korb Engineering Co.

Lisa L. Lewis, GA EPD

Larry Rogers, EPD Coastal District

File (CA): Glynn; 0630017



EPD Review Comments

**UST Closure Report:
East Coast Ice Company
1029 Bay Street
Brunswick, Glynn County, GA
Facility ID: 0630017*1**

November 3, 2003

1. Please be advised that the soil samples should have been analyzed for BTEX, PAH's, and **TPH-DRO** using approved analytical detection limits and methods. However, since groundwater was encountered during closure, please collect one groundwater sample and analyze for BTEX only. Please ensure that the laboratory uses the approved detection limits. If the groundwater sample contains any of the BTEX constituents above the detection limit, please specify the name and distance to the nearest surface water body.
2. Please submit the original chain of custodies and lab data to the EPD.

November 3, 2003

MEMORANDUM

TO: Lisa L. Lewis-USTMP

FROM: Kelly B. Adams-USTMP

SUBJECT: **File Review Leading to Deficiency Letter**
UST Closure Report
East Coast Ice Company
1029 Bay Street
Brunswick, Glynn County, GA
Facility ID: 0630017*1

A Closure Report was received on October 29, 2003 documenting the closure by removal of one 5,000 gallon diesel tank. Korb Engineering Company conducted the sampling and reporting. According to the Closure Report, piping and or dispenser island sampling was not necessary.

Two soil samples were collected at either end of the UST at approximately 6.5 feet bgs. The samples were analyzed for BTEX (8260) and PAH's (8270). Benzene was BDL, but the method detection limit was 0.006 mg/kg and 0.0075 mg/kg. Maximum toluene was 0.0078 mg/kg, and the maximum total xylenes concentration was 0.012 mg/kg. PAH's were BDL.

Two confirmatory soil samples were collected at the same locations at 9.5 feet bgs. Again, benzene was BDL. However, the method detection limit was elevated (0.012 mg/kg and 0.0065 mg/kg). Toluene was detected in one sample at 0.013 mg/kg.

Groundwater was encountered during confirmation sampling, but was not sampled.

The original lab data and chain of custody was not submitted.

EPD letter dated November 3, 2003 is deficiency letter requesting the following:

- a. Please be advised that the soil samples should have been analyzed for BTEX, PAH's, and **TPH-DRO** using approved analytical detection limits and methods. However, since groundwater was encountered during closure, please collect one groundwater sample and analyze for BTEX only. Please ensure that the laboratory uses the approved detection limits. If the groundwater sample contains any of the BTEX constituents above their respective detection limits, please specify the name and distance to the nearest surface water body.
- b. Please submit the original chain of custodies and lab data to the EPD.

The consultant's address is:
Andrew D. Korb, PE
Korb Engineering Company
297 Redfern Village
St. Simons, GA 31522

(LW)
create

KORB ENGINEERING COMPANY
297 Redfern Village
St. Simons, GA 31522
(912) 638-9906 / FAX (912) 638-9954
adkorb@comcast.net

October 23, 2003

GA Dept. of Natural Resources, Land Protection Branch
UST Program Management
4244 Industrial Parkway, Suite 104
Atlanta, GA 30354-3906

OCT 23
KA
CA

75

USA 10/30/03

Ref: East Coast Ice Co. (aka Cumberland Ice Co.)
1029 Bay Street
Brunswick, GA: Glynn County
ID 630017

Att'n: Mr. Ron Wallace

We are seeking a No Further Action (NFA) letter for the above-named facility. This will complete the closure of an underground storage tank (UST) removed from the site in 1990. No samples were taken as the tank was being removed, as is normally required. However, soil samples from the site were taken by us on September 15, 2003 and neither BTEX nor PAH were detected. A complete GUST-9 report is attached.

A successful closure of this tank is required for a real estate transaction that is pending. Accordingly, if you can expedite your review of these documents, we would be most appreciative.

Thank you for your assistance with this matter. If you have questions, please contact us at the above address.

Sincerely,



Andrew D. Korb, PE
/mos

Facility ID #: 630017 USTMP CLOSURE REPORT FORM

Complete this form and provide documentation to substantiate information as outlined in the Underground Storage Tank (UST) Closure Guidance Document (GUST-9). Use a separate form for each tank excavation.

I. GENERAL

A. UST OWNER Company Name (if applicable): GISCO Industries

Mailing Address: 221 Magnolia Ave. City: St. Simons State: GA Zip: 31522

Owner's Name (printed): Brent Thomas Phone: (912) 638-7546

I hereby certify that the information in this Closure Report and in all the attachments is true, accurate, and complete, and the Closure Report satisfies all criteria and requirements of Rule 391-3-15-.09 of the Georgia Rules for Underground Storage Tank Management.

Signature (of owner listed under "Name" above):

Brent Thomas Date: 10/23/03

B. REMOVAL CONTRACTOR (Prime Contractor/Prime consultant)

Company: Korb Engineering Co. (Sampling & Reporting Only)

Mailing Address: 297 Redfern Village City: St. Simons Island State: GA Zip: 31522

Name of Company Representative (printed): Monte W. Korb, PE Phone: (912) 638-9906

I hereby certify that I have performed or supervised the work detailed in this report, and have examined and am familiar with the information submitted in this and all attached documents. The submitted information is, to the best of knowledge, true, accurate, complete, and in accordance with the Georgia Rules for Underground Storage Tank Management, revised February, 1995.

Signature (of same contractor listed under "Name"):

Monte W. Korb Date: 10-24-03

C. UST Site Facility Name: East Coast Ice Co. County: Glynn Fac. I.D.#: 630017

Street Address: 1029 Bay St. City: Brunswick State: FL Zip: 31520

Site was previously known as and is still referred to as "Cumberland Ice Co." in some documents.

II. TANKS AND PIPING CLOSURE DATA

A. LIST USTs THAT HAVE BEEN CLOSED (Use the same tank ID # as on the 7530-1):

TANK ID#	1	This data refers to closure activity on this tank as performed previously by others				
Product	DIESEL FUEL					
Size (gals)	5,000					
How Closed	<input checked="" type="checkbox"/> Removed	<input type="checkbox"/> Removed	<input type="checkbox"/> Removed	<input type="checkbox"/> Removed	<input type="checkbox"/> Removed	
(check one)	<input type="checkbox"/> In Place	<input type="checkbox"/> In Place	<input type="checkbox"/> In Place	<input type="checkbox"/> In Place	<input type="checkbox"/> In Place	
Date Last Used	ca 1990					
Date Closed	Removed 9/23/90 by others but closure was not completed					
(Date removed from ground or filled in-place)						

LIST ANY USTs STILL IN USE AT THE FACILITY (Use same tank ID # as on 7530-1):

TANK ID#	NONE				
Product					
Size (gals)					

III. SAMPLING AND ANALYTICAL

A. Soil/Groundwater Sampling: The quantity of samples taken should be in accordance with USTMP closure guideline (GUST-9) requirements and all samples must be collected in accordance with current EPA-approved sampling procedures.

B. Regulated Substance Released: Whenever free product is encountered and/or analytical results indicate that BTEX, PAH, or TPH contamination is present in the soil and/or groundwater, a release must be reported to EPD via telephone or fax by the next business day explaining what has been found and what steps were taken to eliminate any hazardous conditions and prevent the spread of contamination. Indicate here what substance, if any, was released:

☒ None ☐ Gasoline ☐ Diesel ☐ Kerosene ☐ Used Oil ☐ Other (Name):
Date release reported to EPD: _____

C. Laboratory Analytical Methods Used (check all that were used):

5035-8021B _____ 5035-8015 _____ 5035-8260 ☒ 8100 _____ 8310 _____ 8270 ☒
Other _____

If Method 5035 was used to sample, which method was used to collect and contain the samples?
Encore™ _____ Syringe/corer and field-preserved in 40 ml vial _____

IV. TANK EXCAVATION SAMPLES (see Section V. of this form for piping trench samples)

<u>Size (capacity in gallons) of UST</u>	<u># of samples required per UST</u>
<1,050	1
1,050 - 12,500	2
> of equal to 12,501	2 per UST + 1 per additional 10,000 gals

(Collect 1 sample per UST if a groundwater sample was collected within 2 feet of the excavation.)

A. Based on the total number of USTs closed as reported on this form, the total number of tank excavation samples taken for this site was: 4

B. If over-excavation is performed, take one confirmation sample every 30 linear feet along the base of the sides (within 1 ft of the bottom of the excavation) and one sample per 200 sq ft along the bottom of the excavated area.

- 1) Was over-excavation performed? Yes _____ No ☒
- 2) If "yes", what was the area of the excavation in square feet? _____
- 3) Enter total number of over-excavation samples for this site here: _____

SEE ATTACHED SKETCH

- C. Site-Specific Hydrogeology:** 1.) Was Groundwater encountered? X Yes No
 2.) If encountered, at what depth: 9.5 feet
 3.) If Table B Threshold Levels are being used, how far is the nearest drinking water well or point of withdrawal for drinking water? N/A ft.

D. Groundwater conditions: If more than one foot of groundwater covers more than 50% of the base of the excavation, a groundwater sample may be taken in lieu of soil samples from the base of the excavation. One soil sample per UST must still be collected at the fill-pipe end of each UST along the sidewalls at the soil-water interface.

Enter total number of soil-water interface samples for this site here:

V. PIPING SYSTEM EXCAVATION SAMPLES

A. PIPING TRENCH

N/A

Distance from UST to nearest dispenser island: Less Than 25 ft * 25 feet or more
 # of samples required for each trench: 0 * 1 sample per 25 feet **

What was the distance from the USTs along each piping trench to the nearest dispenser island?
 (feet) [(feet) (feet) (if more than one trench)]

How many confirmation samples were collected from each piping trench?

 (piping trench 1) [(piping trench 2) (piping trench 3)]

B. DISPENSER ISLAND

N/A

Number of dispenser islands X Length of each Dispenser Island (ft) / 25(ft) = # of Samples
 (Rounded **up** to nearest whole number)

How many dispensers were present in the closed system(s)?

How long was each dispenser island (ft)?

How many dispenser samples were collected?

* Although no piping trench samples are required if the piping length is <25 ft., dispenser samples are required.
 Exception: If the dispenser is directly above the tank excavation, no piping samples and no dispenser samples would be required.

** This includes all fittings (couplings, elbows, flex hoses, etc.) between the tank and the dispenser island. Do not count fittings at the tank excavation and the islands. For straight piping runs, estimate 20 ft between couplings.

VI. EXCAVATED SOIL

A. Sampling:

How many cubic yards of material was excavated?

Based on one sample per 200 cubic yards of excavated soil or fraction thereof,
 the total number of excavated soil samples:

VII. CLOSURE SUMMARY

A. CONCLUSIONS

___ Soil or groundwater contamination exists in excess of the levels specified in the above situations and this closure report is being submitted within a certified CAP-Part A.

X Clean Closure, No Further Action Required because analytical results indicate the condition marked below:

X BTEX, PAHs and TPH are below detection limits (BDL) in the soil.

___ BTEX and PAHs are BDL in the soil and TPH (and BTEX) is vertically delineated to BDL above the groundwater table.

___ BTEX and PAHs are above detection limits in soil but below Table A Threshold Levels, and TPH, PAHs, and BTEX in soil is vertically delineated to BDL above the groundwater table.

___ BTEX and PAHs are above detection limits but below Table B Threshold Levels, a water supply survey indicates there are no potential receptors within the applicable radii, and BTEX, PAHs, and TPH in soil is vertically delineated to BDL above the groundwater table.

___ BTEX and PAHs are less than Table A Threshold Levels and BTEX, PAHs or TPH is not vertically delineated to BDL above the groundwater table because groundwater is encountered in the boring or the excavation, and the water sample does not contain BTEX or PAHs above Federal or State MCLs.

___ BTEX and PAHs are less than Table B Threshold Levels and BTEX, PAHs, or TPH is not vertically delineated to BDL above the groundwater table because groundwater is encountered in the boring or excavation, and the water sample does not contain BTEX or PAHs above In-stream Water Quality Standards, and the water supply survey indicates that there are no water supplies within the applicable radii.

B. SITE MAP (Attach to report): The map must be to scale OR, as a minimum, distances between the tank pit area, piping trenches, dispenser islands, sewer, water, utility lines (or other preferential pathways), road and main buildings must be accurately indicated on the map. These listed features must be depicted on the map in order to accurately interpret the data. The map must also include a north (N) directional arrow. Tank ID's must correspond to EPA Form 7530-1 and sample locations, sample identification numbers and depths must also be shown. Sample numbers must correspond to attached laboratory analytical data. Although not mandatory, photos may be attached to help clarify the UST system layout.

SOIL/GROUNDWATER ANALYTICAL RESULTS SUMMARY

(Use additional pages as necessary)

Facility Name: East Coast Ice Company

Facility ID # 630011

Volatile Organic Compounds

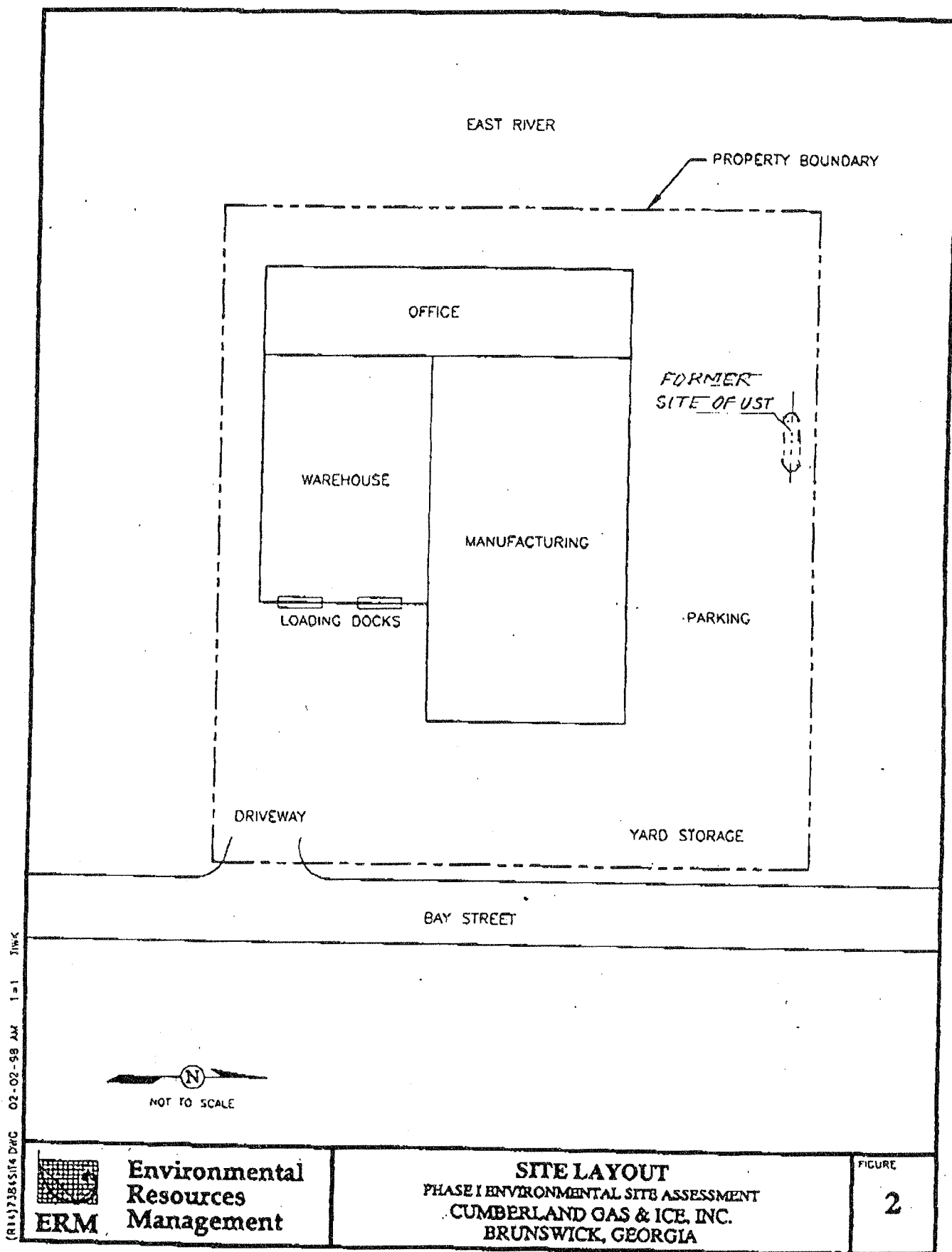
(Indicate S for Soil and GW for Groundwater. GW results must be in ug/l and soil results in mg/kg)

Sample ID	S/GW	Depth	Benzene	Toluene	Ethylbenz.	Xylenes	Total BTEX	TPH	Units
1A1	S	6.5'	ND	ND	ND	ND	ND	ND	mg/kg
2A1	S	6.5'	ND	ND	ND	ND	ND	ND	mg/kg
1B1	S	9.5'	ND	ND	ND	ND	ND	ND	mg/kg
2A1	S	9.5'	ND	ND	ND	ND	ND	ND	mg/kg

Polynuclear Aromatic Hydrocarbons (PAHs)

(Indicate S for Soil and GW for Groundwater. Report soil concentrations in mg/kg and groundwater in ug/L.)

Sample ID#	S/GW	Depth	Detected PAH Compounds	Total PAHs	Units
1A	S	6.5'	---NONE---	---	mg/kg
2A	S	6.5'	---NONE---	---	mg/kg
1B	S	9.5'	---NONE---	---	mg/kg
2B	S	9.5'	---NONE---	---	mg/kg



**STL****STL Savannah**5102 LaRoche Avenue - Savannah GA 31404 Telephone: (912) 354-7858 Fax: (912) 351-3673

Analytical Report

For: Mr. Monte Korb
Korb Engineering
297 Red Fern Village
St. Simons Island, GA 31522
CC:

Order Number: S387208
SDG Number:
Client Project ID:
Project: CUMBERLAND ICE
Report Date: 09/30/2003
Sampled By: Client
Sample Received Date: 09/12/2003
Requisition Number:
Purchase Order:
Revised Date: 10/23/2003

A handwritten signature in cursive script, reading "Sheila B. Hoffman", written over a horizontal line.

Sheila B. Hoffman, Project Manager
sbhoffman@stl-inc.com

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

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Sample Summary

Order: S387208
Date Received: 09/12/2003

Client: Korb Engineering
Project: CUMBERLAND ICE

Client Sample ID	Lab Sample ID	Matrix	Date Sampled
1A1	S387208*1	Solid	09/12/2003 08:00
1B1	S387208*2	Solid	09/12/2003 08:00
2A1	S387208*3	Solid	09/12/2003 08:00
2B1	S387208*4	Solid	09/12/2003 08:00
1A	S387208*5	Solid	09/12/2003 08:00
1B	S387208*6	Solid	09/12/2003 08:00
2A	S387208*7	Solid	09/12/2003 08:00
2B	S387208*8	Solid	09/12/2003 08:00

STL Savannah

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Analytical Data Report

Lab Sample ID	Description	Matrix	Date Received	Date Sampled	SDG#
87208-1	1A1	Solid	09/12/03	09/12/03 08:00	
87208-2	1B1	Solid	09/12/03	09/12/03 08:00	
87208-3	2A1	Solid	09/12/03	09/12/03 08:00	
87208-4	2B1	Solid	09/12/03	09/12/03 08:00	

Parameter	Units	Lab Sample IDs			
		87208-1	87208-2	87208-3	87208-4
		1A	1B	2A	2B

Volatiles by GC/MS (8260)

Benzene	ug/kg dw	<6.0	<12	<7.5	<6.5
Toluene	ug/kg dw	7.4	13	7.8	<6.5
Ethylbenzene	ug/kg dw	<6.0	<12	<7.5	<6.5
Xylenes, Total	ug/kg dw	12	<25	<15	<13
Percent Solids		87	49	79	74
Dilution Factor		1	1	1	1
Prep Date		09/22/03	09/22/03	09/22/03	09/22/03
Analysis Date		09/22/03	09/22/03	09/22/03	09/22/03
Batch ID		1M0922	1M0922	1M0922	1M0922

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Analytical Data Report

Lab Sample ID	Description	Matrix	Date Received	Date Sampled	SDC#
87208-5	1A	Solid	09/12/03	09/12/03 08:00	
87208-6	1B	Solid	09/12/03	09/12/03 08:00	
87208-7	2A	Solid	09/12/03	09/12/03 08:00	
87208-8	2B	Solid	09/12/03	09/12/03 08:00	

Parameter	Units	Lab Sample IDs			
		87208-5 1A	87208-6 1B	87208-7 2A	87208-8 2B

Semivolatile Organics (8270)

Naphthalene	ug/kg dw	<360	<650	<420	<430
Acenaphthylene	ug/kg dw	<360	<650	<420	<430
Acenaphthene	ug/kg dw	<360	<650	<420	<430
Fluorene	ug/kg dw	<360	<650	<420	<430
Phenanthrene	ug/kg dw	<360	<650	<420	<430
Anthracene	ug/kg dw	<360	<650	<420	<430
Fluoranthene	ug/kg dw	<360	<650	<420	<430
Pyrene	ug/kg dw	<360	<650	<420	<430
Chrysene	ug/kg dw	<360	<650	<420	<430
Benzo(a)anthracene	ug/kg dw	<360	<650	<420	<430
Benzo(b)fluoranthene	ug/kg dw	<360	<650	<420	<430
Benzo(k)fluoranthene	ug/kg dw	<360	<650	<420	<430
Benzo(a)pyrene	ug/kg dw	<360	<650	<420	<430
Indeno(1,2,3-cd)pyrene	ug/kg dw	<360	<650	<420	<430
Dibenzo(a,h)anthracene	ug/kg dw	<360	<650	<420	<430
Benzo(g,h,i)perylene	ug/kg dw	<360	<650	<420	<430
Methylnaphthalene	ug/kg dw	<360	<650	<420	<430
Surrogate-2FBP *	%	37 %	36 %	57 %	44 %
Surrogate-NBZ *	%	34 %	33 %	57 %	39 %
Surrogate-TPH *	%	44 %	70 %	110 %	54 %
Percent Solids		92	51	79	76
Dilution Factor		1	1	1	1
Prep Date		09/15/03	09/26/03	09/26/03	09/15/03
Analysis Date		09/25/03	09/30/03	09/30/03	09/25/03
Batch ID		0915C	0926C	0926C	0915C

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Analytical Data Report

Lab Sample ID	Description	Matrix	Date Received	Date Sampled	SDG#
07208-9	TCLP Extraction Fluid Blank	Liquid	09/12/03		

Parameter	Units	Lab Sample IDs
		87208-9

Volatiles by GC/MS (8260)

Benzene	ug/l	*
Dilution Factor		*
Prep Date		*
Analysis Date		*
Batch ID		*

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Analytical Data Report

Lab Sample ID	Description	Matrix	Date Received	Date Sampled	SDG#
57208-10	Method Blank	Solid	09/12/03		
87208-11	Lab Control Standard % Recovery	Solid	09/12/03		

Parameter	Units	Lab Sample IDs	
		87208-10	87208-11

Volatiles by GC/MS (8260)

Benzene	ug/kg dw	<5.0	96 %
Toluene	ug/kg dw	<5.0	106 %
Ethylbenzene	ug/kg dw	<5.0	
Xylenes, Total	ug/kg dw	<10	
Dilution Factor		1	1
Prep Date		09/22/03	09/22/03
Analysis Date		09/22/03	09/22/03
Batch ID		1M0922	1M0922

Semivolatile Organics (8270)

Naphthalene	ug/kg dw	<330	
Acenaphthylene	ug/kg dw	<330	
Acenaphthene	ug/kg dw	<330	59 %
Fluorene	ug/kg dw	<330	
Phenanthrene	ug/kg dw	<330	
Anthracene	ug/kg dw	<330	
Fluoranthene	ug/kg dw	<330	
Pyrene	ug/kg dw	<330	70 %
Chrysene	ug/kg dw	<330	
Benzo(a)anthracene	ug/kg dw	<330	
Benzo(b)fluoranthene	ug/kg dw	<330	
Benzo(k)fluoranthene	ug/kg dw	<330	
Benzo(a)pyrene	ug/kg dw	<330	
Indeno(1,2,3-cd)pyrene	ug/kg dw	<330	
Dibenzo(a,h)anthracene	ug/kg dw	<330	
Benzo(g,h,i)perylene	ug/kg dw	<330	
2-Methylnaphthalene	ug/kg dw	<330	
Surrogate-2FBP *	%	59 %	56 %
Surrogate-NBZ *	%	55 %	52 %
Surrogate-TPH *	%	65 %	65 %
Dilution Factor		1	1
Prep Date		09/15/03	09/15/03
Analysis Date		09/17/03	09/28/03
Batch ID		0915C	0915C

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These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report.

GA. CERT. #803

SW-846, Test Methods for Evaluating Solid Waste, Third Edition, September 1986, and Updates I, II, IIA, IIB, and III.